

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

JOHN P. POLCASTRO SR.
PLAINTIFF

CIVIL ACTION NO.
1:05-cv-00909-MEF-VPM

V.
GREG WARD, ET AL
DEFENDANTS

RECEIVED
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION FOR DISCOVERY

COME NOW JOHN P. POLCASTRO SR, PLAINTIFF
IN THE ABOVE STYLED CASE, AND SUBMIT HIS
REQUEST FOR DISCOVERY.

ON OR ABOUT August 10 2005,
Deputy Perez from the Geneva County Sheriff's
Dept. took pictures of Plaintiff's face. Deputy
Perez, No. 2423 stated, And I quote, (I'm
taking these pictures in case you ever
need them, I'm not getting blamed for
this, end of quote,

Many requests were made to
Head Jailer Rowe for copies of these
pictures. None were answered.

Plaintiff requests copies of
those pictures. And copies of all pictures
taken when Plaintiff was locked into the
Geneva County Jail.

These pictures will show
that Deputy Ray mock lied to the court
when he said all he did was push
Plaintiff away from him. The un answered
question is, How many times was-

3
Plaintiff's Petition,
Plaintiff's Requests copies be
sent to him and the Court.

Respectfully submitted this 7th day
of August, 2006.

John P. Polcastro Sr. Plaintiff
245160 3/97
3800 Fountain
Altmore AL 36503

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day
of August 2006, I have served the foregoing
document on the following

Mr. Richard Hill Jr.
Attorney for Defendants
Webb & Eley, PC
7475 Hickory Point Drive
P.O. Box 240909
Montgomery AL 36104

by placing a true and correct copy of the
foregoing in the U.S. Mail, postage prepaid, on
this 7th day of August 2006.

John P. Polcastro Sr.
Plaintiff
John P. Polcastro Sr.